G-MVI-3 (202)267-1444

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The Reflexite Corp. 315 South St. New Britain, CT 06050

APPROVAL OF RETROREFLECTIVE MATERIAL TO SOLAS REQUIREMENTS

We are prepared to begin approval of retroreflective materials to the new SOLAS requirements, using the technical specification prepared at the last meeting of the IMO Lifesaving, Search and Rescue Sub-Committee and subsequently approved by the IMO Assembly in Assembly Resolution A.658(16). Many of the SOLAS testing requirements can be waived based upon previous satisfactory completion of Coast Guard approval testing. The additional testing required to obtain approval to the SOLAS requirements is as follows, taken from the IMO technical specification:

- a) Accelerated Weathering. Reflective intensity test results after 750 and 1,500 hours of accelerated weathering will be required (for Type I and Type II materials, respectively). Previous results at 1,000 hours for Type II material (the present CG requirement) will of course be acceptable as representing the 750 hour test. The performance requirement is retention of 80% of the minimum required reflective intensity (vs. 50% for the corresponding CG test).
 - b) Flexibility. Testing at -30° C with a 3.2 mm mandrel will be required.
- c) Tensile Strength. As this is not presently a CG requirement, full testing in accordance with the IMO Recommendation will be required.
- d) Adhesive Strength. The IMO Recommendation utilizes a different test method than is contained in the CG specification, so full testing will be required.
- e) Blocking. This IMO test has no CG counterpart, so full testing will be required.

We do not intend to issue different approval numbers for materials approved to the SOLAS requirements. Upon receipt of test reports documenting satisfactory completion of all of the required testing, we would issue a revised approval certificate with an endorsement indicating compliance with the requirements of SOLAS 74/83.

Please contact Mr. Kurt Heinz of my staff if you have any questions concerning any of above.

Sincerely,

R. L. MARKLE
Chief, Survival Systems Branch
Merchant Vessel Inspection and
Documentation Division
By direction of the Commandant

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